

Exhibit 6

**Gonzalez, Betzabeth
L.C., a minor v. State of California**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through)
her guardian ad litem Maria)
Cadena; et al.,)
)
 Plaintiff,)
)
 vs.) Case No.
) 5:22-cv-00949-KK-(SHKx)
STATE OF CALIFORNIA; COUNTY)
OF SAN BERNARDINO; et al.,)
)
 Defendants.)
)
)

VIDEOCONFERENCE DEPOSITION OF BETZABETH GONZALEZ
Taken on Monday, December 30, 2024, at 10:20 a.m.

REPORTED BY:

NICOLE JOHNSON

CSR No. 13030

**Gonzalez, Betzabeth
L.C., a minor v. State of California**

16 Deposition of BETZABETH GONZALEZ, taken on
17 behalf of the defendants, via Zoom videoconferencing, at
18 10:20 a.m., Monday, December 30, 2024, before Nicole
19 Johnson, CSR #13030, as a Certified Shorthand Reporter
20 within and for the County of Orange, State of California.

1 try to just kind of take it as you give it to me in
2 whatever blocks you give it to me. Okay?

3 A. Okay.

4 Q. So if I'm understanding you, you looked out your
5 bathroom window. And what you see, really what you hear,
6 is a back and forth conversation between police who are
7 trying to get the civilian out of the vehicle?

8 A. Correct.

9 Q. And how did you come to learn that his name was
10 **Hector?**

11 A. Because they kept calling him Hector.

12 Q. And what is it that they were wanting **Hector** to
13 do?

14 A. To step out of the vehicle.

15 Q. How many times do you think they asked him to do
16 that?

17 A. I don't remember.

18 Q. More than once?

19 A. Yes, more than once.

20 Q. More than five times?

21 A. Yes.

22 Q. More than ten times?

23 A. I don't know. It was a back and forth. Because
24 I recall him telling them, "You're going to shoot me. If
25 I come out, you're going to shoot me." And then there

1 was -- I remember one -- one of the officers, like, from
2 Clarita's side -- so -- that was standing by Catalpa
3 seemed to be really, like -- he was the one that was,
4 like, really communicating with him and got him to come
5 down from the car.

6 But the ones that were behind him seemed like
7 they were just getting in the way, like, the way they were
8 talking to him. So, yeah. Like, I -- I remember that.
9 And him just like -- I think that's what got my attention
10 more than anything, because I remember hearing him saying,
11 "You're going to shoot me, you're going to shoot me."

12 **Q. How long did -- you estimated for us that it was**
13 **about an hour from the time that you first heard the**
14 **sirens go northbound on your street to when they came back**
15 **around and the vehicle stopped; right?**

16 **A. Correct.**

17 **Q. Okay. How long do you think police were**
18 **speaking with Puga after the vehicle had stopped before he**
19 **got out of his car?**

20 **A. I don't know. It had to have been more than --**
21 **more than -- more than half an hour, for sure. But I**
22 **don't know. I would have to, like -- I don't know,**
23 **honestly. I don't even know how I could look at a**
24 **timeline and figure that out.**

25 **Q. And for the entire, at least 30 minutes -- I**

1 cooperate and come out.

2 Q. When you say the officers that were
3 communicating with him aggressively, those were the
4 officers that were kind of behind the white truck?

5 A. Yeah.

6 Q. Those officers, did they have on black uniforms?

7 A. I couldn't tell.

8 Q. Okay. How many officers were behind the truck
9 that were communicating aggressively with Mr. Puga?

10 A. I want to say it was three of them. But, yeah,
11 I think it was three of them.

12 Q. Were they yelling at Mr. Puga?

13 A. Yeah.

14 Q. When Mr. Puga was responding to the officers,
15 what was his tone of voice like?

16 A. It just seemed like -- I don't know if I want to
17 say helpless, but like -- like he knew he was going to get
18 shot. Like, it just seemed like he just knew, like, if he
19 got out, like, he was going to get shot.

20 ATTORNEY ESQUIVEL: Objection. Move to strike
21 as speculative. Lacks foundation.

22 BY ATTORNEY SINCICH:

23 Q. And when you say that Mr. Puga believed that he
24 was going to get shot, you don't mean to say that you know
25 what was going on inside of his mind; right?

1 A. Correct, no. Just from what he was saying and
2 the tone of his voice.

3 Q. Right. So from what you were able to see and
4 hear from the tone of his voice and how he was acting, did
5 it appear to you that Mr. Puga was scared of the police?

6 ATTORNEY ESQUIVEL: Objection. Lacks
7 foundation. Calls for speculation.

8 THE WITNESS: Well, he didn't have -- he didn't
9 believe that they were going to, like -- going to take him
10 gently and just put him in the back of the car.

11 ATTORNEY MARGOLIES: Same objections.

12 BY ATTORNEY SINCICH:

13 Q. When you heard Mr. Puga say, "You're going to
14 shoot me, you're going to shoot me," was he still in the
15 car when he said that?

16 A. I believe so, yes.

17 Q. When he said that, in your opinion, was his tone
18 of voice scared of the police?

19 A. Yeah, scared --

20 ATTORNEY ESQUIVEL: Same objections.

21 BY ATTORNEY SINCICH:

22 Q. I'm sorry, did you say yes?

23 A. I said yes, yeah.

24 Q. And the officer that was communicating with him
25 kind of from the front left of the vehicle, you said that

**Gonzalez, Betzabeth
L.C., a minor v. State of California**

1 REPORTER'S CERTIFICATION

2

3 I, Nicole Johnson, do hereby certify:

4 That I am a licensed Certified Shorthand
5 Reporter, duly qualified and certified as such by the
6 State of California.

7 That prior to being examined, the witness named
8 in the foregoing deposition was duly sworn to testify
9 under oath.

10 That the preceding deposition was recorded
11 stenographically by me at the time and place herein
12 mentioned; and that the preceding pages constitute a
13 complete and accurate record of the testimony given by the
14 aforementioned witness.

15 That I am a neutral party, in no way interested
16 in the outcome of said action, and that I am not related
17 to or otherwise connected with any of the parties involved
18 with this matter, or their respective counsel.

19

20 Dated: January 10, 2025

21

22



23

24 Nicole Johnson, CSR No. 13030

25